

# **EXHIBIT F**

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February 3, 2017

**VIA ELECTRONIC MAIL**

Susan Sharko, Esq.  
Drinker Biddle & Reath LLP  
600 Campus Drive  
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**Re: In re Benicar (Olmesartan) Products Liability Litigation,**  
**MDL No. 2606**  
**NJ MCL Case No. 299**

Dear Ms. Sharko:

Please find enclosed Plaintiffs' Answers and Objections of David Kessler, M.D., to Schedule A of the Notice of Deposition, served upon you in advance of his deposition confirmed for Monday, February 6, at 9:30 a.m. at Lieff Cabraser Heimann & Bernstein, LLP, 275 Battery St., 29th Floor, San Francisco, CA 94111. Plaintiffs note that Defendants' first served the Notice of Deposition and Schedule A clearly out of time on Friday, January 30, 2017. Therefore, Plaintiffs are not obligated to provide responses at this time; however, enclosed please find objections.

Please also find below a supplemental reliance list to the Expert Report of David Kessler, M.D.

Expert Report of Marianne Mann, M.D. and references cited therein
Expert Report of Keith T. Wilson, M.D. and references cited therein
Expert Report of Richard Hansen, Ph.D., RPh, FAPhA and references cited therein
Expert Report of Harvey Risch, M.D. and references cited therein
Expert Report of Stephen Lagana, M.D. and references cited therein
Expert Report of Susan Hutfless, PhD, S.M. and references cited therein
Expert Report of Daniel Leffler, M.D. and references cited therein
Expert Report of Benjamin Lebwohl, M.D. and references cited therein
Expert Report of Randall L. Tackett, PhD. and references cited therein
Menne J and Haller H, <i>Olmesartan and Intestinal Adverse Effects in the ROADMAP Study</i> , Mayo Clin. Proc. December 2012, 87(12):1230-1232.

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Haller H, Ito S, et al. <i>Olmesartan for the Delay or Prevention of Microalbuminuria in Type 2 Diabetes</i> , N Engl J Med 364; 10 Mar (2011).
Kauppinen K and Alanko K, <i>Oral Provocation: Uses</i> , Seminars in Dermatol., Vol 8, No 3, Sept (1989), 187-191.
Girard M, <i>Oral Provocation: Limitations</i> , Seminars in Dermatol., Vol 8, No 3, Sept (1989), 192-195.
Akram S, Murray J, Pardi D, Alexander G, Schaffner J, Russo P and Abraham S. <i>Adult autoimmune enteropathy: Mayo Clinic Rochester experience</i> . <u>Clin Gastroenterol Hepatol</u> . 2007 Nov;5(11):1282-90.
Al-Bawardy B, Sheedy SP, Herberts MB, Murray JA, Rubio-Tapia A, Rajan E, Bruining DH, Hansel SL, Barlow JM, Fletcher JG and Fidler JL. <i>Collagenous sprue cross-sectional imaging: a comparative blinded study</i> . Abdom Radiol (2016) DOI: 10.1007/s00261-016-1007-1
Aziz I, Peerally MF, Barnes J-H, Kandasamy V, Whiteley JC, Partridge D, Vergani P, Cross SS, Green PH and Sanders DS. <i>The clinical and phenotypical assessment of seronegative villous atrophy; a prospective UK centre experience evaluating 200 adult cases over a 15-year period (2000–2015)</i> . Gut 2016;0:1–10. doi:10.1136/gutjnl-2016-312271
DuPont HL. <i>Persistent Diarrhea - A Clinical Review</i> . JAMA. 2016;315(24):2712-2723. doi:10.1001/jama.2016.7833
Galanopoulos M, Varytimiadis L, Tsigaridas A, et al. <i>Small bowel enteropathy associated with olmesartan medoxomil treatment</i> . Annals of Gastroenterology (2017) 30, 131-133.
Phan C and Guglielmi G. <i>Metabolic Bone Disease in Patients with Malabsorption</i> . Semin Musculoskelet Radiol 2016;20:369-375.
Philip NA, Ahmed N and Pitchumoni CS. <i>Spectrum of Drug-induced Chronic Diarrhea</i> . J Clin Gastroenterol 2017;51:111–117.
Roca-Argente L, et al. <i>Acute kidney injury secondary to diarrhea caused by “sprue-like” enteropathy associated with olmesartan</i> . Nefrologia. 2016. <a href="http://dx.doi.org/10.1016/j.nefro.2016.10.005">http://dx.doi.org/10.1016/j.nefro.2016.10.005</a>
Uehara T, Ikusaka M, Ohira Y, et al. <i>Olmesartan-induced Enteropathy Manifesting as Wernicke-Korsakoff Syndrome</i> . Intern Med 55: 3675-3678, 2016 DOI: 10.2169/internalmedicine.55.7388

Thank you for your attention to this matter.

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Sincerely,

*s/ Tara Sutton*

Tara Sutton

cc: Bruce Parker, Esq. (*via email only*)  
Rayna Kessler, Esq. (*via email only*)  
Daniel Carroll, Esq. (*via email*)  
Adam Slater, Esq. (*via email only*)  
Chris Coffin, Esq. (*via email only*)  
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February 5, 2017

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Dear Ms. Sharko:

Please find below a second supplemental reliance list to the Expert Report of David Kessler, M.D.

Klepper M. and Cobert B. <i>Drug Safety Data: How to Analyze, Summarize, and Interpret to Determine Risk</i> , 1st ed. (2011).
Medicines and Healthcare products Regulatory Agency. <i>Good Pharmacovigilance Practice Guide Compiled by the Medicines and Healthcare products Regulatory Agency</i> , published by Pharmaceutical Press (2009).
Venulet J. <i>Assessing Causes of Adverse Drug Reactions with special reference to standardized methods</i> (1982).
Greenson J.K., et al. <i>Diagnostic Pathology: Gastrointestinal</i> , 2nd ed. (2016).
Cobert B. and Biron P. <i>Practical Drug Safety from A to Z</i> (2009).
Cobert B. <i>Cobert's Manual of Drug Safety and Pharmacovigilance</i> , 2nd ed. (2012).
Walker R. and Whittlesea C. <i>Clinical Pharmacy and Therapeutics</i> , 5th ed. (2012).
Hujoel I. and Rubio-Tapia. <i>Sprue-Like Enteropathy Associated with Olmesartan: A New Kid on the Enteropathy Block</i> , GE Port. J. Gastroenterol. 2016;23(2):61-65.
<a href="http://www.icd9data.com/2013/Volume1/520-579/570-579/579/579.8.htm">http://www.icd9data.com/2013/Volume1/520-579/570-579/579/579.8.htm</a>
<i>Form for Reporting Serious Adverse Events and Product Problems With Human Drug and Biological Products and Devices; Availability; Notice</i> , Federal Register, June 3, 1993, Part II, Department of Health and Human Services, Vol. 58, No. 105.
10/2015 Revised Viagra label

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Shah Khan A., et al. <i>Viagra deafness – sensorineural hearing loss and phosphodiesterase-5 inhibitors</i> , The Laryngoscope, Vol. 121, Issue 5 (May 2011).
Beaugerie and Pardi D.S. <i>Review article: drug-induced microscopic colitis – proposal for a scoring system and review of the literature</i> , Aliment Pharmacol. Ther. 2005; 22: 277-284 (5 Jun. 2005).
Pusztaszeri MP, Genta, RM, Cryer, BL. <i>Drug-induced injury in the gastrointestinal tract: clinical and pathologic considerations</i> , Nature Clinical Practice: Gastroenterology & Hepatology, Vol. 4, No. 8: 442 - 453 (August 2007).
Padwal R., et al. <i>Comparative Effectiveness of Olmesartan and Other Angiotensin Receptor Blockers in Diabetes Mellitus: Retrospective Cohort Study</i> , Hypertension. 2014;63:977-983.
Aziz I, Peerally MF, Barnes J-H, Kandasamy V, Whiteley JC, Partridge D, Vergani P, Cross SS, Green PH and Sanders DS. <i>The clinical and phenotypical assessment of seronegative villous atrophy; a prospective UK centre experience evaluating 200 adult cases over a 15-year period (2000–2015)</i> . Gut 2016;0:1–10. doi:10.1136/gutjnl-2016-312271.
Freeman HJ. <i>Drug-induced Sprue-like Intestinal Disease</i> , Intl. J. of Celiac Disease, 2014 2 (2), pp. 49-53. Doi 10.12691/ijcd-2-2-5.
Girard M. <i>Oral Provocation: Limitations</i> , Seminars in Dermatology, Vol. 8, No. 3 (September), 1989: pp. 192-195.
Kauppinen K. and Alanko, K. <i>Oral Provocation: Uses</i> , Seminars in Dermatology, Vol. 8, No. 3 (September), 1989: pp. 187-191.
Stephens M. <i>Deliberate Drug Rechallenge</i> , Human Toxicol. (1983), 2, 573-577.
Arora D. <i>Pharmacovigilance – An Industry Perspective</i> , by PharmaPublisher (2012).

Thank you for your attention to this matter.

Sincerely,

s/ Tara Sutton

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